UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JOY SINGH, Individually And On Behalf Of All Others Similarly Situated,

Plaintiff,

v.

TRI-TECH HOLDING, INC.; WANZONG ZHAO a/k/a WARREN ZHAO; YUNXIANG FAN a/k/a PHIL FAN; GUANG CHENG a/k/a GAVIN CHENG; PENGYU DONG a/k/a PETER DONG; ERIC HANSON, PETER ZHOU, JOHN MCAULIFFE, PEIYAO ZHANG, DA-ZHUANG GUO, MING ZHU, DAVID HU, XIAOPING ZHOU, and ROBERT W. KRAFT,

Defendants.

No: 13-CV-9031 (KMW)

LEAD PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR: FINAL APPROVAL OF PROPOSED CLASS ACTION SETTLEMENT

PLEASE TAKE NOTICE that on October 16, 2015 at 10:00 a.m. in Courtroom 18B of the United States District Court located at 500 Pearl Street, New York, New York, 10007-1312, or as soon thereafter as the parties can be heard, plaintiffs will and hereby do move the Court, the Honorable Kimba M. Wood, for final approval of the proposed class action.

This motion is based upon this notice of motion and motion, the accompanying memorandum of law, the accompanying Joint Declaration of Phillip Kim and Thomas J. McKenna In Support of Lead Plaintiffs' Motion For: (1) Final Approval of Proposed Class Action Settlement; and (2) Award of Counsel Fees, Reimbursement of Expenses, and Award to Lead Plaintiffs, the exhibits attached thereto, and such argument and additional papers as may be submitted to the Court before and at the hearing on this motion.

Dated: September 16, 2015 Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

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Co-Lead Counsel for Lead Plaintiffs and the Class

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2015, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/__Phillip Kim____